

TO:

Magalie Roman Salas, Commission Secretary
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Federal Communications Commission
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FROM:

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RE: Comments on Federal-State Joint Board on Universal Service seeks comment on review of Lifeline and Link-Up service for all Low-Income Consumers

CC Docket No. 96-45

Released: October 12, 2001

My name is Cindy Datig, Executive Director of the Dollar Energy Fund. The Dollar Energy Fund is a nonprofit organization serving 66 counties in Pennsylvania by providing utility assistance, education, and conservation to low income households. The comments I am providing represent my experience in working with low-income families and individuals, who are payment troubled and/or have special needs. These are the individuals who would most benefit from a successful outreach program for enrollment in Lifeline/Link-Up.

My comments concerning why individuals are not applying are as follows:

- Individuals are not receiving adequate information.
- Individuals are not excluding themselves from participating by choice.
- The network of resources that assist low-income households are not involved in the delivery of information about Lifeline/Link-Up.
- There is no education plan in creating an awareness of the programs.
- There is no advertisement announcing or reminding the public of availability.

Our experience in reaching the low-income community is a multi approach. The reason more people have not signed on to the Lifeline/Link-Up Programs is three-fold. The main reason is they don't know about the programs, another reason is the qualification standard, and the third reason is the enrollment process.

First I would like to address the qualification standards. Participation in a federal program should not be qualifying criteria. These programs should be available to all income eligible customers. The qualifying criteria should not be based on participation in other programs but should be based on income. The objective is to target those who cannot afford phone service.

I administer many utility assistance programs for the gas, light and water companies. We are very successful in reaching our target goals for enrollment. Setting an enrollment goal and having consequences in place for not achieving the goal are incentives to all companies and administering organizations. In turn, the goals established at the utilities become my goals. Those enrollment goals should be based on need as the low-income programs are in Pennsylvania. For instance, when the gas and electric restructuring legislation passed it included goals for enrollment in special payment programs for low-income. When I administer a program those goals become mine to achieve. Together, the utility company and I develop and implement creative approaches for enrollment. For example, I will go to the call center and talk to the utility reps taking customer calls. The next time a customer calls seeking information on service the rep will ask specific question to prescreen for eligibility. Call center participation is vital for reaching goals. Second, I partner with established community based organizations. (In Pennsylvania, the Dollar Energy Fund works with 150 community based organizations serving as intake sites). The community groups are a variety of service providers and are easily accessible in low-income neighborhoods.

Because many states already have low-income utility programs in place, Link-Up /Lifeline should join forces. By this I mean if the income eligibility is the same why not

complete applications for all programs at the same time. Why should we duplicate our efforts by making a low-income household apply at a different place for each utility industry? Each utility program is asking for the same information as Link-Up/Lifeline. Why not take all the applications at the same time.

In order to increase enrollment a public awareness campaign must be in place. This can be accomplished in many different ways. There is of course the media to spread the word of the existence of the programs. The phone company call center staff must be an integral component of the public awareness campaign. It is the call center that receives the first customer contact inquires for service. The call center staff must be educated to offer the programs in appropriate situations by having a script in place to determine possible eligibility.

Education must also be an integral component of the public awareness campaign. The Dollar Energy Fund has been a key player in educating the public about electric choice in Pennsylvania. We have in place ten educators throughout the state who identify opportunities to deliver an unbiased message concerning their electric supplier. These opportunities include staffing a booth at a local fair, speaking engagements before Head Start families, the Senior Centers and providing “train the trainer” sessions for community based organizations. The community groups then pass the information on to their clients and other partnering organizations.

The Dollar Energy Fund determines and documents eligibility in a number of ways and that is truly the key to our success. Clients are given numerous options for enrollment in the programs. There are applications available at multiple community-based organizations. These applications are designed to be very easy to complete. However, if help is needed agency personnel are available for assistance. The applicant provides income documentation. The application is sent by internet, mail or fax to the Dollar Energy Fund office. The staff verifies the income documentation and approves or rejects the application. Notice is then given as a report to the utility company. This process can take 30 minutes to 48 hours depending on the method of application delivery.

The Dollar Energy Fund also maintains an 800 number that can be accessed from anywhere in Pennsylvania. This allows for a case management approach for low-income households. The clients we assist do not have a utility problem, they have an income problem. Our 800-line approach is to attempt to deal with the household as a whole and deal with the multiple issues of a low-income household. This process also provides the opportunity to “sell” the program and include a positive behavior reward system. Our clients are told the benefits of the programs and the consequences of nonpayment. In addition, a payment made on time is met with “congratulations on making your payment on time”.

This process has resulted in a successful electric choice education program and in reaching our goals for low-income utility programs in Pennsylvania. These proven processes should be replicated for the telecommunications industry.

I hope you find my comments helpful and I look forward to answering any questions you may have. I can be reached at (412) 431-2800 ext. 318. Thank you for the opportunity to comment.

Cindy Datig
Executive Director
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